

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA)
)
 v.) No. 1:19-cr-02-JL
)
 THEODOROS BAHTSEVANOS)

UNITED STATES' ASSENTED-TO MOTION TO CONTINUE SENTENCING

The United States, by its undersigned attorney, hereby moves to continue sentencing, currently scheduled for September 16, 2019, in this matter for 45 days. Grounds follow.

Defendant executed a waiver and acknowledgment, pleading guilty to a three-count indictment in June 2019. The charges against the defendant consisted of two counts of misuse of a DEA Registration number in violation of 21 U.S.C. § 843(a)(2) and one count of possessing five or more false identification documents in violation of 18 U.S.C. § 1028(a)(3). The charges arose out of the defendant's attempts in May 2018 to obtain controlled substances from pharmacies with false prescriptions and fake state driver's licenses. Sentencing was scheduled for September 16, 2019. The defendant has enjoyed the benefit of pre-trial release since his January 2019 indictment.

While the Probation Officers were researching the draft Presentence Report, the parties learned about new, similar charges, against the defendant in Massachusetts apparently based on new conduct in 2019. Those new charges, which are pending, led to a delay in the preparation of the draft Presentence Report. The government respectfully requests a continuance of the sentencing so that the Probation Officers may finish the draft report and the parties may timely review, respond and/or object in advance of sentencing. This brief continuance will also allow

the parties to learn more about the nature of the new charges in Massachusetts and their potential impact, if any, on the defendant here in New Hampshire.

Defendant's counsel assents to the requested continuance.

No memorandum accompanies this motion because it is unopposed.

WHEREFORE, the government respectfully requests the Court continue sentencing for forty-five (45) days.

Respectfully submitted,

SCOTT W. MURRAY
UNITED STATES ATTORNEY

Dated: August 12, 2019

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